

From: [Stephen G. Larson](#)
To: [Makarewicz, Valerie \(USACAC\)](#)
Cc: [Sebastian, Manu J.](#); [Gardner, Brianna M.](#); [Jonathan D. Gershon](#); [Hilary Potashner](#)
Subject: [EXTERNAL] RE: Cardiff Protective Order Stipulation
Date: Saturday, December 9, 2023 2:55:15 PM
Attachments: [image388549.png](#)
[Cardiff PII Protective Stip.docx](#)

I think we will need to revise this protective order based on the circumstances of defendant's pretrial release. As you know, Jason is essentially in the custody of his personal attorney, Steven Cochell, and living in Texas under pretrial supervision and the other conditions imposed by the court. We will need to be able to have him review the discovery in Texas – it is simply not practical to transport Jason from Texas to our offices in California every time we need to review discovery with him. I suggest we make it clear that Mr. Cochell is part of the defense team (even though he is not formally engaged in that capacity), that we can send Mr. Cochell the discovery, and that Jason can review the discovery under Mr. Cochell's supervision in Texas. Does that work for the government?

Also, I may be mistaken, but I don't think I've seen a response regarding the government's position on this case being related to the FTC matter with Judge Gee. Please advise at your earliest convenience.

Finally, please copy my colleagues Jonathan Gershon and Hilary Potashner on all correspondence related to this matter.

Thanks,
Stephen

Stephen G. Larson

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From: Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov>

Sent: Monday, December 4, 2023 10:56 AM

To: Stephen G. Larson <slarson@larsonllp.com>

Cc: Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov>; Gardner, Brianna M.

<Brianna.M.Gardner@usdoj.gov>

Subject: Cardiff Protective Order Stipulation

Hi Stephen,

Attached is a draft stipulation for a protective order for PII for you to review, thank you,
VLM

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